



October 10, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via
Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly,
Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Arkansas Repertory theatre, located in Little Rock, Arkansas that provides approximately 215 performances per year to 60,000 audience members and education programs to 7,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. The Rep's mission is to produce diverse theatrical works of the highest artistic standards. With a focus on dramatic storytelling that illuminates the human journey, The Rep entertains, engages and enriches local and regional audiences of all ages and backgrounds.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Arkansas Repertory Theatre

John Miller-Stephany
Producing Artistic Director

Michael McCurdy
Managing Director

Cliff Fannin Baker
Founder

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Arkansas Repertory Theatre has 28 channels of wireless microphones. All are Shure brand. The models include 16 channels of UHFR (J5 band-frequency range of 578.1-637.7 MHz), 9 channels of ULXP (M1 band-frequency range of 662-698 MHz); 1 channel of ULXs (J2 band-frequency range of 554-590 MHz), and 2 channels of QLXD (G50 band-frequency range of 470-534 MHz).

We have one channel of Shure PSM 900 series In-Ear Wireless System (G6 band-frequency range 470-506 MHz). We also have 4 channels of HME RW800 Wireless intercom that we use on a regular basis that includes 1 base station and 4 communicator belt-pacs. These belt-pacs are not frequency agile.

We use gear in Low UHF and High UHF. The microphones and IEMs are frequency agile. Our wireless intercom is not. We have 26 channels of rf mics that are analogue, 1 channel of IEM that is analogue, and 4 channels of intercom that is analogue. We have 2 channels of RF mics that are Digital.

I would have expected a long life from our wireless microphones, at least 10 years of usability, if it were not for the Reverse auction that just occurred. Our most recent upgrade was in the neighborhood of \$35,000. With the proposed changes we will lose usage of the 16 channels of UHFR, and the 9 channels of ULXP.

Our resident sound engineer attended South Plains College for an A.A.S. in Sound Technology with a Live Sound certification, which included RF work and classes. He also has a Dante Level 1 certification. He has been using RF microphones professionally for 9 years, with all systems of at least 25 or 30 channels used. In his time here we have had up to 58 channels of RF mics on stage at the same time with no interference and have had well over 40 many times with no interference issues.

We would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Professional performing arts organizations and educational institutions need to have access to reliably available spectrum with interference protection. We would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band – in our case it cost over \$35,000. As a not for profit institution we are not in a financial situation to once again replace our sound equipment.

We endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

A handwritten signature in black ink, appearing to read 'McCurdy', written over the printed name.

Michael McCurdy
Managing Director
Arkansas Repertory Theatre